

## **Remarks**

Claims 1-30 are pending in this application. Claims 25-28 are allowed. The Examiner has rejected claims 1-2, 6, 12-18 and 29-30 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,766,412 to Bolt, et al. (hereinafter “Bolt”). The Examiner has rejected claims 3-5, 7-11 and 19 under 35 U.S.C. § 103(a) as being obvious over Bolt in view of U.S. Patent Publication No. 2003/0084219 to Yao, et al. (hereinafter “Yao”). Claims 20-24 are objected to as being dependent upon a rejected base claim. Applicants respectfully traverse the Examiner’s rejections.

### **A. Remarks Regarding Rejection of Claims 1-2, 6, 12-18 and 29-30 Under 35 U.S.C. § 103 (a)**

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). “All words in a claim must be considered in judging the patentability of that claim against the prior art.” *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

Bolt fails to teach or suggest all the claim limitations of amended independent claims 1, 29 and 30. Specifically, the combination fails to teach or suggest any of the following: 1) determining an address of the one of the plurality of hosts that issued the original command; 2) adding an identifier to the original command encoded in the second protocol to make a revised command, the identifier associating the one of the plurality of hosts that issued the original command; or 3) sending the revised command to a target device.

Regarding the step of “determining an address of the one of the plurality of hosts that issued the original command,” the Examiner claims Bolt discloses this step in Figure 6, reference 600 and column 17, lines 27-29. Office Action, p. 3-4. Reference 600 of Figure 6 represents a decision block titled “Corresponding Device Operational?” Likewise, column 17, lines 27-29 of Bolt states: “if in step 600 above, the microbridge 25 determines that the corresponding device 148 is operational. . .” According to Bolt, device 148 is an individual tape drive. Col. 17, ll. 5-13. The cited portion of Bolt thus teaches that a microbridge determines if an individual tape drive is operational. Determining operation status is not the same as determining an address of the one of the plurality of hosts that issued the original command, as required by the present invention. Significantly, Bolt fails to teach determining anything about the host(s)--rather, Bolt discloses determining the status of the drive(s). Moreover, the passage cited only discloses determining whether a drive is *operational* and does not teach determining an *address*. Therefore, Bolt does not teach or suggest “determining an address of the one of the plurality of hosts that issued the original command” as required by this claims. Applicants respectfully request withdrawal of all rejections.

Regarding the step of “adding an identifier to the original command encoded in the second protocol to make a revised command, the identifier associating the one of the plurality of hosts that issued the original command,” the Examiner acknowledges that Bolt does not disclose this step. Office Action, p. 4. The Examiner states that this step would have been obvious to one of ordinary skill in the art because Bolt discloses: “Commands directed by the host to the drive may include ‘test unit ready,’ ‘inquiry,’ ‘start-stop’ and ‘load-unload’ commands, in addition to the obvious ‘read/write’ commands. One important characteristic about this command structure is that the logical address of the drive is supplied to the media

loader as a destination.”” Office Action, p. 4 (citing Bolt, col. 1, ll. 60-65). The Examiner further quotes Bolt: “when the host 12 dispatches a medium-changer command, such as EXCHANGE MEDIUM command (including a source storage media clot location and a final logical drive address of a specified drive)...” Office Action, p. 4, (citing Bolt, col. 15, ll. 49-53).

Again, these two passages are unrelated to the step claimed in the present application. The first passage simply states that the logical address of the drive is supplied to a media loader. As explained by Bolt, the drive is the *destination* of the command, and identification of the address of the destination is different than, and serves a completely different function from, identification of the address of the *sender* of the command. Identification of the destination of a command is necessary for routing the command to the appropriate recipient, but identification of the sender of the command is not similarly necessary. Moreover, as the identification of the sender would consume additional bandwidth and require additional processing, one of ordinary skill in the art would not be motivated to send such seemingly inconsequential information to the recipient. Additionally, the present invention discloses making a *revised* command by appending an identifier to the command, which permits the claimed invention to function with preexisting hardware and protocols. In contrast, Bolt fails to teach any revision of original commands. For these reasons, Bolt’s disclosure of sending the address of the destination device is unrelated to the claimed step of “adding an identifier to the original command encoded in the second protocol to make a revised command, the identifier associating the one of the plurality of hosts that issued the original command,” and does not render the claimed invention obvious.

Regarding the claimed step of “sending the revised command to a target device,” the Examiner points to Figure 4A, reference 148; Figure 6, reference 610; and col. 17, ll. 32-33

of Bolt as disclosing this step. These cited passages discuss “perform[ing] protocol conversion from the host 12 protocol to the device 148 protocol and forward[ing] the host request to the device 148 (step 610).” Bolt, col. 17, ll. 32-33. As mentioned above, Bolt fails to teach any revision of the command before the command is sent to the target device. Thus, Bolt fails to teach this limitation.

The Examiner rejected dependent claims 3-5, 7-11 and 19 as being obvious over Bolt in light of Yao. Yao fails to remedy the deficiencies of Bolt described above, and the Examiner provides no additional comments suggesting as much. Thus, the combination of Bolt and Yao does not overcome the deficiencies of Bolt specifically outlined above.

As Bolt fails to teach or suggest each and every element of independent claims 1, 29 and 30, and one of ordinary skill would not have been motivated to alter Bolt to achieve the present invention, Bolt does not render these claims obvious or otherwise anticipate the claims. Applicants respectfully submit that these independent claims are allowable. Additionally, Applicants submit that dependent claims 2-19 are allowable, as they depend from otherwise allowable base claims.

**B. Remarks Regarding Rejection of Dependent Claims 3-5, 7-11 and 19 Under 35 U.S.C. § 103**

The rejection of dependent claims 3-5, 7-11 and 19 will not be discussed individually herein, as each of these claims depends, either directly or indirectly, from an otherwise allowable base claim.

**C. Remarks Regarding Objection to Dependent Claims 20-24 Due to Dependence on Rejected Base Claim**

The rejection of dependent claims 20-24 will not be discussed individually herein, as each of these claims depends, either directly or indirectly, from an otherwise allowable base claim.

**D. No Waiver**

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the cited references. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by examiner, Applicants do not acquiesce to examiner's additional statements, such as, for example, any statements relating to what would be obvious to a person of ordinary skill in the art. The example distinctions discussed by Applicants are sufficient to overcome the anticipation rejections.

**Conclusion**

Applicants respectfully submit that the pending claims 1-30 of the present invention, as amended, are allowable. Applicants respectfully request that the rejection of the pending claims be withdrawn and that these claims be passed to issuance.

Respectfully submitted,



Tammy M. Pennington  
Registration No. 61,223

Baker Botts L.L.P.  
910 Louisiana  
One Shell Plaza  
Houston, Texas 77002-4995  
(713) 229-1972

Baker Botts Docket Number: 016295.1506

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